

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	CHAPTER 13
)	
MATHU RAJAN,)	CASE No. 25-10356 (DJB)
)	
DEBTOR.)	
)	

**MOTION UNDER 11 U.S.C. § 362(j) FOR ORDER
CONFIRMING THE TERMINATION OF THE AUTOMATIC STAY**

Mark L. Bunce, a/k/a Mark Leonard Bunce (“Movant”), hereby files this motion under 11 U.S.C. § 362(j) for an order confirming that the automatic stay has been terminated, and shows the Court as follows:

1. Movant is a creditor and party in interest in the above-referenced case, and has asserted claims against Debtor, Mathu Rajan (“Debtor”), in a lawsuit in the United States District Court for the Eastern District of Pennsylvania, Case No. 2:23-cv-01740.¹

2. This Chapter 13 case was filed on January 28, 2025, and Debtor is an individual. During the one-year period preceding the filing of this case, Debtor was a debtor in a prior case, Case No. 25-10042, which was dismissed on January 27, 2025. This current case is not a case refiled under a chapter other than Chapter 7 following a prior case that was dismissed pursuant to 11 U.S.C. § 707(b). *See* 11 U.S.C. § 362(c)(3).

3. Thirty (30) days have elapsed since this current case was filed, and there is no order extending the automatic stay.

¹ Nothing in the motion waives, releases, or impairs any claim or rights of Movant, all of which claims and rights are expressly reserved and preserved, including, without limitation, the claims asserted in the U.S. District Court for the Eastern District of Pennsylvania, Case No. 2:23-cv-01740.

4. Movant therefore shows that the automatic stay has terminated pursuant to 11 U.S.C. § 362(c)(3), and pursuant to 11 U.S.C. § 362(j) Movant requests an order confirming that the automatic stays has been terminated.

WHEREFORE, Movant respectfully requests that the Court enter an Order confirming that the automatic stay has terminated, and requests such other and further relief as is just and equitable.

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